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VIA FOIA REQUEST ONLINE PORTAL

U.S. Environmental Protection Agency (EPA)
National FOIA Office
1200 Pennsylvania Ave. N.W. (2310A)
Washington, D.C. 20460

Re: Freedom of Information Request

Dear Sir or Madam:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552, and the regulations promulgated thereunder.

My firm is investigating claims by individuals who have been diagnosed with Non-Hodgkin's Lymphoma or suffered other serious injuries after dermal or inhalation exposure to Roundup.

I hereby request that the EPA release a copy of any and all documents in its possession, custody, or control, or in the possession, custody or control of the EPA's current or past agents, servants, employees, or anyone acting on behalf of the EPA or located at any of its facilities and locations, including storage facilities, from files that mention, relate to or discuss the following:

1. Please provide copies of all internal correspondence and all correspondence between or among Bayer AG, Monsanto Company, and/or CropLife America related to the EPA's August 7, 2019 letter regarding label and labeling requirements for products that contain glyphosate ("August 7, 2019 EPA Registrant Letter");
2. Please provide copies of all internal correspondence and all correspondence between or among the EPA and the USTR, the USDA, the FAS, Bayer AG, Monsanto Company, and/or CropLife America related to CropLife America's March 12, 2020 letter to USTR regarding Mexico's compliance with the proposed United States-Mexico-Canada Agreement ("March 12, 2020 CropLife Letter");
3. Please provide copies of all internal correspondence and all correspondence between or among the EPA and the USTR, the USDA, the FAS, Bayer AG, Monsanto Company, and/or CropLife America related to CropLife America's August 7, 2020 letter regarding Mexico COFEPRIS Registration Delay ("August 7, 2020 CropLife Letter");
4. Please provide copies of all internal correspondence and all correspondence between or among the EPA and Bayer AG, Monsanto Company, and/or CropLife America regarding

the EPA's Proposed Interim Registration Review Decision (Case 0178) on glyphosate acid (PC Code 417300) and its various salt forms (PC Codes 103601, 103604, 103605, 103607, 103608, 103613, and 417300) dated April 23, 2019 ("Proposed Interim Registration Decision");

5. Please provide copies of all internal correspondence and all correspondence between or among the EPA and Bayer AG, Monsanto Company, and/or CropLife America regarding the EPA's Interim Registration Review Decision (Case 0178) on glyphosate acid (PC Code 417300) and its various salt forms (PC Codes 103604, 103605, 103607, 103608, and 103613) dated January 22, 2020 ("Interim Registration Decision");
6. Please provide copies of all correspondence regarding any meetings between or among the EPA and Bayer AG, Monsanto Company and/or CropLife America related to the Glyphosate Issue Paper, the August 7, 2019 EPA Registrant Letter, the March 12, 2020 CropLife Letter, the August 7, 2020 CropLife Letter, the Proposed Interim Registration Decision and/or the Interim Registration Decision;
7. Please provide copies of all internal correspondence and all correspondence between or among the EPA and the USTR, the USDA, the FAS, Bayer AG, Monsanto Company and/or CropLife America regarding the United States-Mexico-Canada Agreement (USMCA) effective as of July 1, 2020 and discussions that Mexico's ban on glyphosate and genetically engineered crops potentially raises concerns regarding compliance with USMCA; and
8. Please provide copies of all internal correspondence and all correspondence between or among the EPA and Bayer AG, Monsanto Company and/or CropLife America related to any amicus brief (regardless whether ultimately filed) as part of Roundup trial proceedings, including but not limited to the cases of *Edwin Hardeman v. Monsanto Company* (Case Nos. 19-16636; 19-16708, 9th Cir. Court of Appeals), *Dewayne Johnson v. Monsanto Company* (Case Nos. A155940; A156706, Court of Appeal of the State of California First Appellate District, Division One) and/or *Alva and Alberta Pilliod v. Monsanto Company* (Case No. A158228, Court of Appeal of the State of California First Appellate District, Division 2); *John Carson v. Monsanto Company* (Case No. 21-10994, 11th Cir. Court of Appeals).

This request includes, but is not limited to, any and all correspondence (both internal and external EPA correspondence), including e-mail, meeting minutes, notes, memoranda, reports, presentations, records, papers, electromagnetic recordings or messages, videotapes, audiotapes, diaries, calendars, lists and any other written or recorded material pertaining to the above subject. This request also includes any attachments referenced in cover letters, e-mail, memoranda, reports, etc.

If a document has been prepared in several copies or additional copies have been made and the copies, or any of them, are not identical (or are not identical by reason of subsequent markings including, but not limited to, underlining, showing of blind copies, crossing out, initialing, comments, signatures, documents clipped, stapled, or otherwise attached thereto, etc.), this request seeks to obtain a copy of each non-identical document.

Pursuant to the terms of the Freedom of Information Act, we will pay for copying when you have informed us of the cost. We will pay for any retrieval cost if we are informed of those costs prior to your having incurred them.

We expect to receive a response to this request within the statutorily mandated twenty (20) working days. Please note that this request deserves expedited review because it is related to an issue of government integrity impacting the public health. See DOJ Guide to the Freedom of Information Act, <https://www.justice.gov/oip/doj-guide-freedom-information-act-0>.

Please contact the undersigned if you have any questions regarding the scope of the request or the costs of retrieval and copying.

Thank you for your time and attention to this matter.

Best Regards,

A handwritten signature in black ink, appearing to read 'D. Wool', with a stylized flourish at the end.

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